

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

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AUG 19 2025

ASHLEY BOSHEA As Administrator of
Estate of DAVID JOHN BOSHEA

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DEPOSIT BOX

v.

Case No. 1:21-cv-00309

COMPASS MARKETING, INC.,
Defendant.

MOTION TO SET MATTER FOR HEARING

Michael R. White (Movant¹) respectfully moves this Court to set for a hearing his pending Motion for Sanctions (ECF 269) against Defendant Compass Marketing, Inc. (“Compass”) and their counsel, Stephen B. Stern, and Heather K. Yueng, and Kagan, Stern, Marinello & Beard, LLC.

On May 21, 2024, Movant filed a motion for sanctions (ECF 269) against Defendant Compass Marketing, Inc. (“Compass”) and their counsel¹, Stephen B. Stern, and Heather K. Yueng, and Kagan, Stern, Marinello & Beard, LLC., jointly and severally.

On May 23, 2024, Compass filed a Motion for Extension to File Opposition (ECF 270), which the Court granted, also on May 23, 2024, allowing Compass to file any opposition to the Motion for Sanctions by or before June 27, 2024. (ECF 271).

On June 27, 2024, Compass filed an Opposition to the Motion for Sanctions. (ECF 272).

On July 11, 2024, Movant filed a Reply to the Opposition by Compass. (ECF 273).

Attorneys Stephen B. Stern, Heather K. Yueng, and Kagan, Stern, Marinello & Beard, LLC, never filed any request for an extension, nor any opposition, nor any other response the Motion for Sanctions.

On August 14, 2025, the jury in the above captioned case returned a verdict in favor of the Estate of David Boshea. Thank goodness.

Also on August 14, 2025, the Court in the Anne Arundel Case² dismissed with prejudice Movant and all the defendants in the fraudulent “RICO” lawsuit authored and originally filed by Mr. Stern and Kagan, Stern, Marinello & Beard, LLC. [EXHIBIT 1]. While Mr. Stern and Kagan,

¹ For clarity and focus on the issue at hand, Movant will pretend that Mr. Stern, Ms. Yueng, and Kagan, Marinello and Stern (and for that matter John White) represent Compass. Movant maintains, however, that they do not. (ECF 33 and ECF 42).

² *Compass Marketing, Inc. v. Daniel White, et al.*, Case No. C-02-CV-23-0000601 (Cir. Ct. Anne Arundel Cnty., Md.) (the “Anne Arundel Case”).

Stern, Marinello & Beard, LLC, will likely now feign to have nothing to do with the Anne Arundel Case, Mr. Stern authored and filed the action with knowledge that it was materially false. Moreover, Movant witnessed Mr. Stern in court in Anne Arundel on June 23, 2025, masquerading as counsel for Compass.

Also on August 14, 2025, the Court in the Anne Arundel Case GRANTED Movant's Motion for Sanctions against Compass and counsel for Total Failure of Discovery, because, of course, there was nothing to be discovered - except that the lawsuit was fraudulent. [EXHIBIT 1].

Finally, on August 14, 2025, the Court in the Anne Arundel Case GRANTED the petition by Mr. Stern's co-counsel's for an Emergency Motion for Immediate Granting of Motion to Withdraw, or in the Alternative, for an Emergency In Camera Hearing filed in the Circuit Court for Anne Arundel County on August 4, 2025. [EXHIBIT 1].

Mr. Stern's co-counsel in the Anne Arundel Case, attorney Joyce Smithey, attached to her "emergency" motion to withdraw the sworn Declaration of attorney Alvin Frederick, Jr. Mr. Frederick's Declaration provides direct testimony regarding the conduct of attorneys associated with Compass, including the initial filing of the Annapolis Complaint by attorney Stephen Stern, which has now been exposed as fraudulent in material respects. [EXHIBIT 2].

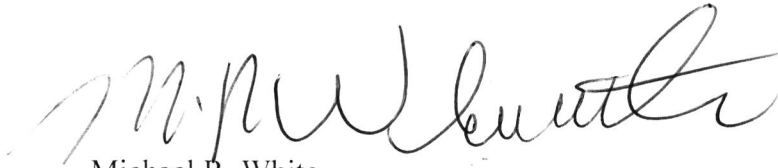
These new facts reinforce the seriousness of the issues before this Court and establish the need for a hearing to resolve:

1. Whether filings against Movant in this case were knowingly authorized and filed in bad faith by Compass Marketing's counsel in this case to influence the fraudulent federal "RICO" case³ and the Anne Arundel Case;
2. The extent to which fraudulent filings in this *Boshea* case have been used to mislead courts and harass non-parties, including Movant, and unnecessarily delay this case; and
3. Appropriate sanctions and remedies under Rule 11, 28 U.S.C. § 1927, and the Court's inherent authority.

Given the gravity of these allegations—implicating attorney misconduct, abuse of process, and fraudulent litigation filings—a hearing is essential to protect the integrity of the Court and ensure accountability.

³ *Compass Marketing, Inc., V. Flywheel Digital, LLC, et al., Civil Action No. GLR-22-379*, United States District Court, D. Maryland (2022).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "M. R. White", with a stylized flourish at the end.

Michael R. White
39650 Hiawatha Circle
Mechanicsville, MD 20659
301-481-5986
michaelrwhite@comcast.net

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PROPOSED ORDER

It is this _____ day of _____, 2025, by the United States District Court for the District of Maryland, hereby:

ORDERED that the Clerk of the Court shall promptly set Movant Michael R. White's Motion for Sanctions against Compass (ECF 269) for a hearing.

So Ordered.

Hon. Ellen L. Hollander
United States District Court Judge

Certificate of Service

I hereby certify that on this 19th day of August, a copy of this notice was sent via first class mail, postage paid to counsel of record.

Stephen B. Stern Esq
Kagan Stern Marinello & Beard LLC
238 West Street
Annapolis Maryland 21401

Heather K. Yeung Esq
Davis, Agnor, Rapaport & Skalny LLC
11000 Broken Land Parkway Suite 600
Columbia Md 21044

Gregory J. Jordan Esq
Jordan & Zito LLC
350 North LaSalle Street Suite 1100
Chicago IL 60654

Thomas J. Gagliardo Esq
Gilbert Employment Law PC
1100 Wayne Ave Suite 900
Silver Spring Maryland 20910

Jonathan P. Kagan
Managing Partner
Kagan Stern Marinello & Beard LLC
238 West Street
Annapolis Maryland 21401



Michael R. White
39650 Hiawatha Circle
Mechanicsville Md 20659
michaelrwhite@comcast.net